



*Consulting Engineers  
and Scientists*

**PASTOR, BEHLING & WHEELER, LLC**  
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February 9, 2009  
(PBW Project No. 1432)

VIA OVERNIGHT COURIER

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: January 2009 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.5 – A Zone C boring was advanced using Cone Penetrometer Testing (CPT) equipment fitted with a Membrane Interface Probe (MIP). A Zone C piezometer (OCPT5) was installed at this location. Water levels were measured in the five Zone C piezometers and Zone C monitoring well (NE4MW32C), and groundwater samples were collected from piezometer OCTP5 and monitoring well NE4MW32C on January 13, 2009. Laboratory analyses of these samples were performed. Investigation-derived wastes (auger cuttings/crushed drums) were profiled and disposed off-site at the Blue Ridge facility.
    - Subtask 6.9 – A draft Nature and Extent Data Report (NEDR) is currently being prepared.

- Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan - data analysis, human health risk evaluation and ecological risk evaluation were partially completed.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
- Waste profile forms/manifests for the off-site disposal of investigation-derived wastes described above are provided in Attachment A.
  - Water levels measured in Zone C monitoring well/piezometers on January 13, 2009, and calculated water level elevations are provided in Attachment B.
  - Field measurements collected during groundwater sampling are provided in Attachment C.
  - Unvalidated analytical laboratory reports for the groundwater sample analyses described above are provided in electronic form on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
- RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through data validation, and data evaluation.
    - Subtask 6.9 – Preliminary Site Characterization Report – to be continued through Draft NEDR preparation.
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through data analysis, human health risk evaluation and ecological risk evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

Mr. Gary Miller  
February 9, 2009  
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Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', written over the company name.

Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLC

**ATTACHMENT A**  
**INVESTIGATION-DERIVED WASTE**  
**PROFILE FORMS/MANIFESTS**



## GENERATOR WASTE PROFILE SHEET

Page 1 of 2

Requested Disposal Facility: BLUE RIDGE  
*an Allied Waste Company*

Waste Profile #
<u>L524815187</u>
AWI Sales Rep: <u>DPK</u>
Date: <u>12/29/08</u>

**I. Generator Information**

Generator Name: <u>LDL COASTAL</u>			
Generator Site Address: <u>906 MARLIN</u>			
City: <u>FREEPORT</u>	County: <u>BRAZORIA</u>	State: <u>TX</u>	Zip: <u>77541</u>
State ID/Reg No: <u>N/A</u>	State Approval/Waste Code: <u>N/A</u>	(If applicable) SIG Code: _____	
Generator Mailing Address (if different): <u>6363 WOODWAY DR STE 730</u>			
City: <u>HOUSTON</u>	County: <u>HARRIS</u>	State: <u>TX</u>	Zip: <u>77057</u>
Generator Contact Name: <u>ERIC PASTOR</u>			
Phone Number: <u>512-671-3434</u>		Fax Number: _____	

**IIa. Transporter Information**

Transporter Name: <u>BAYOU CITY ENV</u>		Contact Name: <u>CARL TRAGESSE</u>	
Transporter Address: <u>PO BOX 87887</u>			
City: <u>HOUSTON</u>	County: _____	State: <u>TX</u>	Zip: <u>77287</u>
Phone Number: <u>713-425-6824</u>	Fax Number: _____	State Transportation Number: <u>88133</u>	

**IIb. Billing Information**

Bill To: <u>USA Environmental, L.P.</u>		Contact Name: _____	
Billing Address: <u>PO Box 87887</u>			
City: <u>Houston</u>	State: <u>TX</u>	Zip: <u>77287</u>	Phone Number: _____

**III. Waste Stream Information**

Name of Waste: <u>CLASS II SOIL FROM INVESTIGATION</u>	
Process Generating Waste: <u>SOIL WAS GENERATED AT A PREVIOUS SUPERFUND SITE DURING INVESTIGATION DERIVED FROM SOIL BORINGS. THE INVESTIGATION (INSTALLATION OF MONITOR WELLS) WAS PERFORMED NEAR A FORMER MARINE SITE MAINTENANCE FACILITY.</u>	
Surface storage tanks located in the concrete berm area contained volatile organic compounds including benzene, chloroform, dichloroethane, and trichloroethylene.	
Site contaminants may include polycyclic aromatic hydrocarbons, pesticides, chlorinated hydrocarbons, and metals.	
Type of Waste:	<input type="checkbox"/> INDUSTRIAL PROCESS WASTE or <input checked="" type="checkbox"/> POLLUTION CONTROL WASTE
Physical State:	<input checked="" type="checkbox"/> SOLID <input type="checkbox"/> SEMI-SOLID <input type="checkbox"/> POWDER <input type="checkbox"/> LIQUID <input type="checkbox"/> OTHER
Method of Shipment:	<input type="checkbox"/> BULK <input type="checkbox"/> DRUM <input type="checkbox"/> BAGGED <input checked="" type="checkbox"/> OTHER: Roll off box
Estimated Annual Volume:	<input checked="" type="checkbox"/> CUBIC YARDS: <u>25</u> <input type="checkbox"/> TONS: _____ <input type="checkbox"/> GALLONS: _____ <input type="checkbox"/> OTHER: _____
Frequency:	<input checked="" type="checkbox"/> ONE TIME <input type="checkbox"/> DAILY <input type="checkbox"/> WEEKLY <input type="checkbox"/> MONTHLY <input type="checkbox"/> OTHER
Special Handling Instructions: _____	

**IV. Representative Sample Certification**

Is the representative sample collected to prepare this profile and laboratory analysis, collected in accordance with U.S. EPA 40 CFR 261.20(c) guidelines or equivalent rules?		<input type="checkbox"/> NO SAMPLE TAKEN
		<input checked="" type="checkbox"/> YES or <input type="checkbox"/> NO
Sample Date: <u>10/28/08</u>	Type of Sample: <input checked="" type="checkbox"/> COMPOSITE SAMPLE <input type="checkbox"/> GRAB SAMPLE	
Laboratory: <u>A&amp;B LABS</u>	Sample ID Numbers: <u>GULFCO MARINE (6)</u>	
Sampler's Employer: <u>USA ENVIRONMENT</u>		

REV 1

© Allied Waste, February 2001

**GENERATOR WASTE PROFILE SHEET (continued)**

Page 2 of 2

Waste Profile #

LD Y8. 1518.7

## V. Physical Characteristics of Waste

Characteristic Components				% by Weight (range)			
1. SOIL CUTTINGS - CLASS II SOIL - SEE ANALYTICAL				100			
2.							
3.							
4.							
5.							
Color	Odor (describe)	Free Liquids <input type="checkbox"/> YES or <input checked="" type="checkbox"/> NO Content %	% Solids	pH	Flash Point	Phenol	
DRK	NONE		100	N/A	N/A IF	N/Appm	
<b>Attach Laboratory Analytical Report (and/or Material Safety Data Sheet) including Required Parameters Provided for this Profile</b>							
Does this waste or generating process contain regulated concentrations of the following Pesticides and/or Herbicides: Chloridane, Dieldrin, Heptachlor (and its epoxides), Lindane, Methoxychlor, Toxaphene, 2,4-D, or 2,4,5-TP Silvex as defined in 40 CFR 261.33?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
Does this waste or generating process cause it to exceed OSHA exposure limits from high levels of Hydrogen Sulfide or Hydrogen Cyanide as defined in 40 CFR 261.23?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
Does this waste contain regulated concentrations of Polychlorinated Biphenyls (PCBs) as defined in 40 CFR Part 761?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
Does this waste contain regulated concentrations of listed hazardous wastes defined in 40 CFR 261.31, 261.32, 261.33, including RCRA P-Listed Solvents?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
Does this waste contain regulated concentrations of 2,3,7,8-Tetrachlorodibenzodioxin (2,3,7,8-TCDD), or any other dioxin as defined in 40 CFR 261.31?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
Is this a regulated Toxic Material as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
Is this a regulated Radioactive Waste as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
Is this a regulated Medical or Infectious Waste as defined by Federal and/or State regulations?						<input type="checkbox"/> Yes or <input checked="" type="checkbox"/> No	
Is this waste generated at a Federal Superfund Clean Up Site?						<input checked="" type="checkbox"/> Yes or <input type="checkbox"/> No	

## VI. Generator Certification

I hereby certify that to the best of my knowledge and belief, the information contained herein is a true, complete and accurate description of the waste material being offered for disposal and all known or suspected hazards have been disclosed. All Analytical Results/Material Safety Data Sheets submitted are truthful and complete and are representative of the waste. I further certify that by utilizing this profile, neither myself nor any other employee of the company will deliver for disposal or attempt to deliver for disposal any wastes which is classified as toxic waste, hazardous waste or infectious waste, or any other waste material this facility is prohibited from accepting by law. I shall immediately give written notice of any change or condition pertaining to the waste not provided herein. Our company hereby agrees to fully indemnify this disposal facility against any damages resulting from this certification being inaccurate or untrue. I further certify that the company has not altered the form or content of this profile sheet as provided by Allied Waste.

Waste. Stephen M. LeRoy  
Stephen M. LeRoy Third Party Agent for LDL Coastal Lf  
Authorized Representative Name And Title (Printed) Company Name  
Stephen M. LeRoy, USA 121 05 108  
Authorized Representative Signature Date

## VII. Allied Waste Decision

<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Rejected		Expiration: 03/31/09
Conditions:		
by Rutkowski, Special Waste Analyst		
Name, Title	Signature	Date
[Blank]	[Signature]	12/29/08

Truck 722



NON-HAZARDOUS WASTE MANIFEST

0909416

1. Generator's US EPA ID Number		Manifest Document Number		2. Page 1 of	
3. Generator's Name and Mailing Address 906 Marlin Fresport TX 77541				5. Generating Location (if different)	
4. Phone 812 671-3434				6. Phone ( )	
7. Transporter #1 Company Name Bayou City Environmental		8. US EPA ID Number 009 TX-00052045		9. Transporter #1's Phone	
10. Transporter #2 Company Name		11. US EPA ID Number		12. Transporter #2's Phone	
13. Designated T/S/D Facility Name and Site Address Blue Ridge Landfill 2200 Fm 521 Fresno TX 77545		14. US EPA ID Number		15. Facility's Phone 281-835-6142	
16. Waste Shipping Name and Description		17. Allied Waste Approval # and Exp. Date		18. Containers	
a. CLASS II Soil and Debris		LS24815187		19. Total Quantity 20Y	
b.					
c.					
d.					
21. Additional Descriptions for Materials Listed Above					
22. Special Handling Instructions and Additional Information mail manifest to Carl Traversel PO Box 87687 Houston TX 77287					
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.					
Printed/Typed Name Siobhan LeRoy		Signature Siobhan LeRoy		Month Day Year 12/30/08	
24. Transporter #1: Acknowledgement of Receipt of Materials					
Printed/Typed Name LANCE A Williams		Signature		Month Day Year 1/5/09	
25. Transporter #2: Acknowledgement of Receipt of Materials					
Printed/Typed Name		Signature		Month Day Year	
26. Discrepancy Indication Space					
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in item 19)					
Printed/Typed Name J. Monahan		Signature		Month Day Year 1/5/09	

ORIGINAL - RETURN TO GENERATOR

To order more forms go to: www.cgtisolutions.com/alliedwaste/



## NON-HAZARDOUS WASTE MANIFEST

0909413

1. Generator's US EPA ID Number		Manifest Document Number		2. Page 1 of									
3. Generator's Name and Mailing Address LCL Coastal 906 Marlin Freeport TX 77541				5. Generating Location (if different)									
4. Phone (561) 671-3434				6. Phone ( )									
7. Transporter #1 Company Name Bayou City Environmental		8. US EPA ID Number TXA000032045		9. Transporter #1's Phone									
10. Transporter #2 Company Name		11. US EPA ID Number		12. Transporter #2's Phone									
13. Designated T/S/D Facility Name and Site Address Blue Ridge Landfill 2200 PM 521 Fresno TX 77545		14. US EPA ID Number		15. Facility's Phone 281-835-6142									
16. Waste Shipping Name and Description		17. Allied Waste Approval # and Exp. Date		18. Containers									
a. CLASS II soil and debris		LS24815187		<table border="1"> <tr> <th>No.</th> <th>Type</th> <th>19. Total Quantity</th> <th>20. Unit Wt/Vol</th> </tr> <tr> <td></td> <td>Roll off</td> <td>20#</td> <td></td> </tr> </table>		No.	Type	19. Total Quantity	20. Unit Wt/Vol		Roll off	20#	
No.	Type	19. Total Quantity	20. Unit Wt/Vol										
	Roll off	20#											
b.													
c.													
d.													
21. Additional Descriptions for Materials Listed Above													
22. Special Handling Instructions and Additional Information USA Job # 3229-08-011 mail manifest to USA - Carl Hagen PO Box 87607 Houston TX 77287													
23. GENERATOR'S CERTIFICATION: I certify the materials described on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.													
Printed/Typed Name Siobhan LeRay		Signature Siobhan LeRay		Month Day Year 12/30/08									
24. Transporter #1: Acknowledgement of Receipt of Materials													
Printed/Typed Name LANCE A. HENRIS		Signature Lance A. Henris		Month Day Year 1/5/09									
25. Transporter #2: Acknowledgement of Receipt of Materials													
Printed/Typed Name		Signature		Month Day Year									
26. Discrepancy Indication Space													
27. Facility Owner or Operator: Certification of receipt of waste materials covered by this manifest (except as noted in item 19)													
Printed/Typed Name Lance A. Henris		Signature Lance A. Henris		Month Day Year 1/5/09									

ORIGINAL - RETURN TO GENERATOR

**ATTACHMENT B**  
**WATER LEVEL MEASUREMENTS**

### January 2009 Water Level Measurements

Well ID	Date	Time	MP <sup>1</sup> Elevation (ft AMSL <sup>2</sup> )	Depth to Water (ft BMP <sup>3</sup> )	Water Elevation (ft AMSL)
NE4MW32C	1/13/2009	821	6.31	7.22	-0.91
NG3CPT1	1/13/2009	807	5.79	6.93	-1.14
NE4CPT2	1/13/2009	752	6.77	9.86	-3.09
NC2CPT3	1/13/2009	816	5.36	8.72	-3.36
OCPT4	1/13/2009	735	6.38	13.16	-6.78
OCPT5	1/13/2009	745	5.32	12.72	-7.40

Notes:

<sup>1</sup> MP = Measurement Point (Top of PVC well casing).

<sup>2</sup> AMSL = Above Mean Sea Level (NGVD 29).

<sup>3</sup> BMP = Below Measurement Point.

**ATTACHMENT C**  
**GROUNDWATER SAMPLING FIELD MEASUREMENTS**

**Groundwater Field Parameters - January 2009 Sampling Event  
Gulfco Marine Maintenance Facility**

<b>Monitoring Well ID</b>	<b>Measurement Date</b>	<b>Parameter</b>	<b>Result</b>	<b>Unit</b>
NE4MW32C	1/13/2009	conductivity	27,320	umhos/cm
		field DO	0.2	mg/L
		ORP	-89	mV
		pH	7.01	
		temperature	19.9	Celcius
OCPT5	1/13/2009	conductivity	23,380	umhos/cm
		field DO	0.16	mg/L
		ORP	-131	mV
		pH	7.09	
		temperature	18.4	Celcius